

Via ECFS  
Marlene H. Dortch, Secretary  
Federal Communications Commission  
RE: GN Docket No. 17-258  
445 12th Street, S.W.  
Washington, D.C. 20554

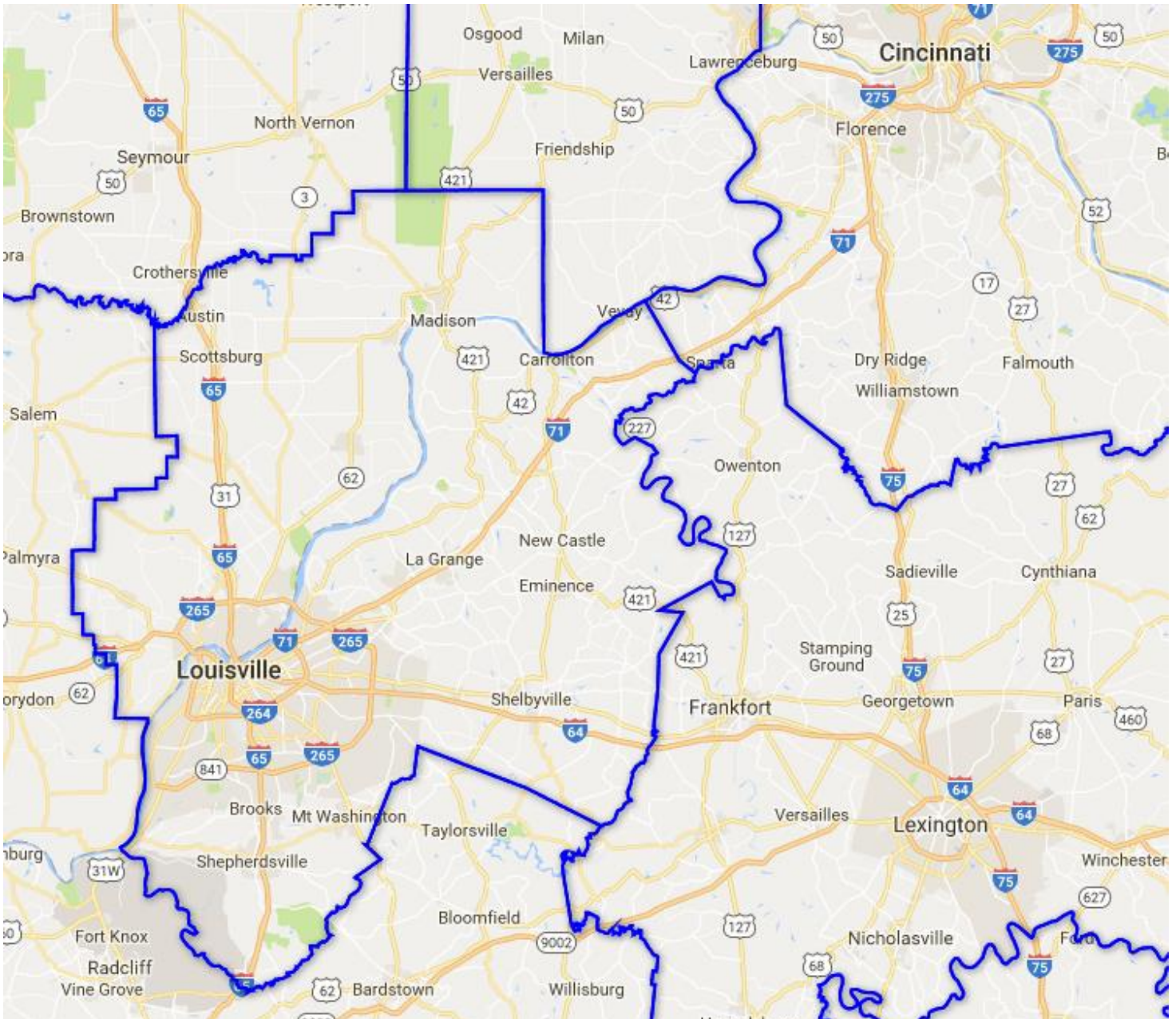
Dear Ms. Dortch:

My company, Shelby Broadband, a Small Business with 15 employees that provides Fixed Wireless broadband service in Kentucky to over 2,000 customers. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have no broadband choices. We built our network from scratch using devices authorized under the FCC adopted to open up 900 MHz, 2.4 GHz, 3.65 GHz and 5 GHz spectrum for unlicensed or light licensed broadband devices. We have been providing internet services since 2006. The CBRS band is important to the future of our business and the additional spectrum will allow us to provide even faster speeds to our customers. We currently offer speeds up to 25Mbps over Fixed Wireless, and capacity demands of our customers will require additional access to more spectrum.

We are a very rural internet service provider. Our map below shows the current coverage area of our Fixed Wireless network. Notice, in the map below we bridge the gap between the Urban and Rural areas of Kentucky.



A change in the CBRS auction rules to increase the size of PALs to PEAs would make it virtually impossible for Shelby Broadband to acquire any licenses. The current PEA map shows that we would have to obtain licensing in 4 areas, which go far beyond the existing Shelby Broadband wireless network. They also include the 3 largest cities closest to my network, Cincinnati, Louisville, and Lexington. All 3 of these cities are areas in which Shelby Broadband has no desire to provide wireless coverage, due to the already existing service coverage by fiber and cable companies.



Using Census Tracts is a much more economical method for us to acquire PALs. We can exclude ourselves from high density areas in the existing large urban areas, which are largely covered by existing fiber and cable companies providing service. Instead, we can pick the areas which make the most sense to continue to provide service to our customers.

Our customers demand more bandwidth. Every year the capacity requirements increase 2-3 times the previous year. Being able to have access to this spectrum will allow us to meet the demands of our customers. These are the same customers that have no other choice but our fixed wireless. Providing choice to Rural America is important, and changing the rules so that only a few can play would be detrimental to Internet Accessibility. The large carriers have widely ignored any rural customer for years, and there should be no thought that this would change if access to PALs



were increased to PEAs. Instead, they would deploy only in high density areas leaving the customers we provide service to without any other options, and the rural customer where we bridge the broadband gap would lose.

Our company has halted any future deployment in the CBRS Band, as uncertainty to the rules has made it difficult for us to make an intelligent financial decision. Shelby Broadband opposes the proposals to increase the size of PALs to the size of a PEA. As a small business, we were planning to participate in PAL auctions based on census tracts. Please provide us with a means to continue to bridge the broadband gap in rural Kentucky providing service where the other carriers have largely ignored.

Sincerely,

Charles T. Hogg Jr.  
President/CEO  
Shelby Broadband